



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JN/DKK  
F. #2017R05903

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 10, 2019

By Email and ECF

James M. Cole  
Michael Levy  
Joan M. Loughnane  
Sidley Austin LLP

David Bitkower  
Matthew S. Hellman  
Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.  
Criminal Docket No. 18-457 (S-2) (AMD)

Dear Counsel:

Enclosed please find the government's eleventh production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendant.

I. The Government's Discovery

<b>Document Description</b>	<b>Category of Discovery Pursuant to Protective Order</b>	<b>Bates Range</b>
Financial Institution Documents, Including Customer Account Information, and Written Correspondence	Discovery Material	DOJ_HUAWEI_A_0001098913- DOJ_HUAWEI_A_0001331015
Financial Institution Documents, Including Customer Account Information, and Written Correspondence	Sensitive Discovery Material ("SDM")	DOJ_HUAWEI_A_0001365244- DOJ_HUAWEI_A_0001369957
Communications related to Huawei Employees in Iran	Discovery Material	DOJ_HUAWEI_A_0001331016- DOJ_HUAWEI_A_0001365243
Communications related to Huawei Employees in Iran	SDM	DOJ_HUAWEI_A_0001369958- DOJ_HUAWEI_A_0001385100

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

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By: /s/ Thea D. R. Kendler  
Thea D. R. Kendler  
David Lim  
Trial Attorneys

cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)